

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: ) Chapter 11  
 )  
MICHAEL CRIBBIN ) Case 09-17207  
 )  
Debtor/Debtor-in-Possession. ) Judge Carol A. Doyle

**NOTICE OF MOTION**

TO: ATTACHED SERVICE LIST:

PLEASE TAKE NOTICE that on the 18<sup>th</sup> day of August 2011 at 10:00 a.m. or as soon thereafter as counsel can be heard, I shall appear before the Honorable Carol A. Doyle, Bankruptcy Judge, in the room usually occupied by her as courtroom 742 in the United States Bankruptcy Court in the Everett McKinley Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, or before any other Judge who may be sitting in her place and stead and shall present the Motion for Entry of Final Decree, a copy of which is attached hereto and herewith served upon you, and shall pray for the entry of an Order in compliance therewith.

AT WHICH TIME and place you may appear if you so see fit.

/s/Jeffrey C. Dan  
Crane, Heyman, Simon, Welch & Clar  
135 S. LaSalle St., Suite 3705  
Chicago, Illinois 60603  
(312) 641-6777

**CERTIFICATE OF SERVICE**

STATE OF ILLINOIS )  
 )  
COUNTY OF COOK )

The undersigned, being first duly sworn on oath deposes and states that a copy of the foregoing Notice and Motion was caused to be served via First Class Mail properly addressed and postage prepaid to all parties on the attached service list, on the 8<sup>th</sup> day of August, 2011.

/s/Jeffrey C. Dan

**SERVICE LIST**

United States Trustee  
Dirksen Federal Court House  
219 S. Dearborn St., Suite 873  
Chicago, IL 60604

Robert L. Pattullo Jr.  
Law Offices of Robert L. Pattullo Jr. PC  
10 S. LaSalle St., Suite 3400  
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Laurie A. Silvestri  
Law Offices of Laurie A. Silvestri  
70 W. Madison St., Ste. 5050  
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Michael Cribbin  
12605 Kinvara  
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**MOTION FOR ENTRY OF FINAL DECREE**

MICHAEL CRIBBIN, Debtor/Debtor in Possession herein ("Debtor"), by and through his attorneys, in support of his Motion for Entry of Final Decree, hereby states as follows:

1. On May 12, 2009, this Court entered an Order for Relief in the above-captioned matter pursuant to a Voluntary Petition under Chapter 11 of the United States Bankruptcy Code.

2. On January 10, 2011, the Debtor filed his Amended Plan of Reorganization (the "Plan") and on January 10, 2011, the Debtor filed his Amended Disclosure Statement. On March 4, 2011, this Court entered an Order Confirming the Plan.

3. The Plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code. All deficiencies regarding the Class 1 and 2 claims of Lisle Savings Bank have been paid by the entry into refinanced notes for which the Debtor has been making payments. However, all approved administrative professional fees due and owing to Debtors' bankruptcy counsel, Crane, Heyman, Simon, Welch & Clar, have not yet been paid in full.

4. The Debtor respectfully requests this Court enter a Final Decree pursuant to Rule 3022 of the Rules of Bankruptcy Procedure and close this bankruptcy case, with a specific reservation of the Court's jurisdiction with respect to the matter stated above.

WHEREFORE, for the foregoing reasons, the Debtor, MICHAEL CRIBBIN, prays for the entry of a Final Decree closing this Chapter 11 case and for such other relief as may be just and appropriate.

Respectfully submitted,  
MICHAEL CRIBBIN,  
Debtor/Debtor-in-Possession,

By: /s/ Jeffrey C. Dan  
One of His Attorneys

**DEBTOR'S COUNSEL:**

David K. Welch, Esq. (Atty. Reg. #06183621)  
Arthur G. Simon, Esq. (Atty. Reg. #03124481)  
Jeffrey C. Dan, Esq. (Atty. Reg. #06242750)  
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